

Hon. Christopher M. Alston
Chapter 7
Hearing Date: June 18, 2021
Hearing Time: 9:30 a.m.
Hearing Site: Telephonic
Response Date: June 11, 2021

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE:

SAMIA EL-MOSLIMANY,

Debtor.

Chapter 7

No. 18-14820-CMA

DECLARATION OF ANTHONY S. WISEN
IN SUPPORT OF CREDITOR HAYAT
SINDI'S OBJECTION TO TRUSTEE'S
MOTION TO APPROVE COMPROMISE
AND SETTLEMENT OF ADVERSARY
PROCEEDING 19-2-0116 CAPTIONED AS
BROWN V. AL-YOUSEF

I, Anthony S. Wisen, declare as follows:

1. I am an attorney with the Law Offices of Anthony S. Wisen, PLLC, counsel to plaintiff Hayat Sindi ("**Plaintiff**" or "**Dr. Sindi**"). My WSBA number is 39656. I am competent to make this Declaration. I have personal knowledge of, or have confirmed through my review of court filings and publicly recorded documents, the facts stated in this Declaration and know them to be true and correct.

DECLARATION OF ANTHONY S. WISEN - 1

Law Offices of Anthony S.
Wisen, PLLC
2208 NW Market St., # 502
Seattle, WA 98107
206.418-8720 · tony@wisenlaw.com

1 2. Plaintiff brought suit against Samia El-Moslimany (“Defendant”) and Ann El-
2 Moslimany on January 25, 2013 in Massachusetts State Court.

3 3. A true and correct copy of the First Circuit’s opinion in the matter *Hayat Sindi*
4 *v. Samia El-Moslimany and Ann El-Moslimany*, 896 F.3d 1 (2018) (the “First Circuit
5 Opinion”) is attached as Exhibit A hereto.

6 4. On February 27, 2017, Dr. Sindi recorded a Notice of Judgment Lien Against
7 Homestead Property and an official copy of the Amended Final Judgment in the King County
8 Real Property Records under Assessor’s Number 20170227001230. A true and correct copy of
9 the recorded document is attached as Exhibit B hereto.

10 5. A true and correct copy of the Second Amended Final Judgment entered on
11 August 17, 2018 in the district court is attached as Exhibit C hereto.

12 6. Dr. Sindi registered the Second Amended Final Judgment in King County
13 Superior Court under Case No. 18-2-22410-1 KNT, and on September 25, 2018, recorded the
14 resulting Foreign Judgment in the King County Real Property Records under Assessor’s
15 Number 20180925000965. A true and correct copy of the recorded document is attached as
16 Exhibit D hereto.

17 7. Attached as Exhibit E hereto is a true and correct copy of the Declaration of Rik
18 Jones, filed on April 9, 2021 in Case No. 18-4820-CMA at Dkt. No. 150.

19 8. Attached as Exhibit F hereto is a true and correct copy of the Notice of Hearing
20 on Trustee’s Motion to: 1) Approve Compromise and Settlement; 2) Authorizing Listing of
21 Property for Sale; 3) to Employ Realtor; or Alternatively, 4) to Compel Turnover of Property
22 of the Estate, filed on April 9, 2021 in Case No. 18-4820-CMA at Dkt. No. 148.

23
24
25
26
27 DECLARATION OF ANTHONY S. WISEN - 2

Law Offices of Anthony S.
Wisn, PLLC
2208 NW Market St., # 502
Seattle, WA 98107
206.418-8720 · tony@wisnlaw.com

9. Attached as Exhibit G hereto is a true and correct copy of the Agreement to Market Property, effective April 30th, 2021.

10. Attached as Exhibit H hereto is a true and correct copy of a screenshot with respect to the property at 2655 SW 151st Pl., Burien, WA, that I obtained from Zillow.com on June 9, 2021.

11. Attached as Exhibit I hereto is a true and correct copy of a information with respect to the property at 2655 SW 151st Pl., Burien, WA, that I obtained from Redfin.com on June 9, 2021.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 11th day of June, 2021.

Law Offices of Anthony S. Wisen, PLLC
Attorneys for Hayat Sindi

By /s/ Anthony S. Wisen
Anthony S. Wisen, WSBA #39656
1752 NW Market St., #709
Seattle, WA 98107
Tel: (206) 418-8720
Email: tony@wisenlaw.com

DECLARATION OF ANTHONY S. WISEN - 3

Law Offices of Anthony S.
Wisn, PLLC
2208 NW Market St., # 502
Seattle, WA 98107
206.418-8720 · tony@wisnlaw.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to those attorneys of record registered on the CM/ECF system.

DATED this 11th day of June, 2021

/s/ Anthony S. Wisen

Anthony S. Wisen, WSBA #39656

DECLARATION OF ANTHONY S. WISEN - 4

Law Offices of Anthony S.
Wisen, PLLC
2208 NW Market St., # 502
Seattle, WA 98107
206.418-8720 · tony@wisenlaw.com